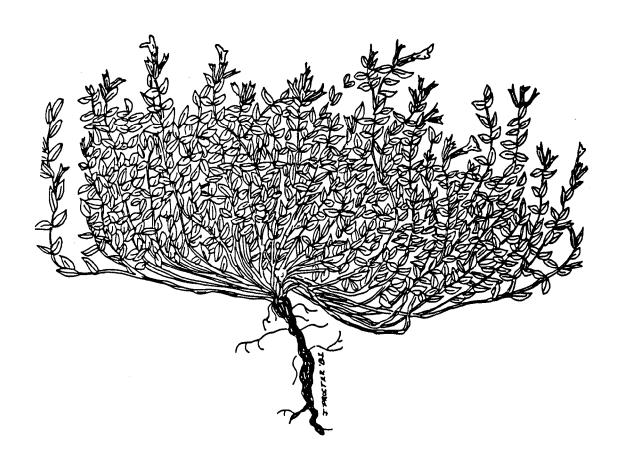
MCKITTRICK PENNYROYAL

(<u>Hedeoma</u> <u>apiculatum</u>)

RECOVERY PLAN



U.S. FISH & WILDLIFE SERVICE ALBUQUERQUE, NEW MEXICO

McKITTRICK PENNYROYAL

Bedeoma apiculatum W.S. STEWART

RECOVERY PLAN

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DISCLAIMER

This is the completed McKittrick Pennyroyal Recovery Plan. It has been approved by the U.S. Fish and Wildlife Service. It does not necessarily represent official positions or approvals of cooperating agencies and it does not necessarily represent the views of all individuals who played key roles in preparing this plan. This plan is subject to modification as dictated by new findings and changes in species status and completion of tasks described in the plan. Goals and objectives will be attained and funds expended contingent upon appropriations, priorities, and other budgetary constraints.

Literature citation should read as follows:

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SUMMARY

GOAL :

To remove **McKittrick** pennyroyal from the Federal list of endangered and threatened species by managing the essential habitat to sustain natural populations in the wild.

RECOVERY CRITERIA:

The criteria for delisting McKittrick pennyroyal have not yet been determined. The implementation of management measures and s tudies specified in this recovery plan will provide the necessary data from which quantified delisting criteria can be established.

ACTIONS NEEDED:

The major steps needed to meet the recovery criteria include: removing threats by working with the National Park Service, U.S. Fores t Service, and USDI Bureau of Land Management to enforce existing regulations and develop management plans; initiating and supporting studies on population biology and ecology; and developing public awareness, appreciation, and support for preservation of McKittrick pennyroyal.

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INTRODUCTION

McKittrick pennyroyal, Hedeoma apiculatum W.S. Stewart, was listed as a threatened species on July 13, 1982 (47 FR 30440), and critical habitat was designated for some of its populations. Several other related taxa also occur in low numbers and are listed or are candidates for listing under the Federal Endangered Species Act (ESA). Hedeoma todsenii is listed as endangered. Hedeoma pilosum and Hedeoma graveolens are included in categories 2 and 1, respectively, in a 1980 notice of review of plant taxa for listing as endangered and threatened species and a 1983 supplement (45 FR 82480, 48 FR 53640).

McKittrick pennyroyal is known only from the Guadalupe Mountains of Texas and New Mexico. The majority of known populations, and largest populations, occur in Guadalupe Mountains National Park, Texas, administered by the National Park Service (NPS). Three other population8 exist outside the park in New Mexico--one each on Lincoln National Forest, private lands, and land administered by the Bureau of Land Management (BLM).

The populations are presently stable, but the **slowly** reproducing plants are potentially threatened by activities of park **visitors**, by future park development, and by possible mining or road construction within Lincoln National Forest and on BLM land. On BLM and private land threat8 are grazing by domestic sheep and exotic auodad sheep, and possible damage from soil erosion and/or flooding of some areas.

The objective of this recovery plan ${f is}$ to protect the plants and their habitat . Part I of the plan contains biological information on

the McKittrick pennyroyal and a description of the threats to its continued existence. Part II outlines and describes steps necessary to protect and recover the **species.** Part III lists recovery tasks **along** with recovery priority ratings, agencies involved, and **costs** for U.S. Fish and Wildlife Service (FWS) tasks.

Taxonomy

McKittrick pennyroyal was first collected by V. Harvard in 1882.

Although it was collected occasionally after 1882, it remained undescribed until 1939, when it was described by William S. Stewart in a review of Hedeoma and allied genera (Epling and Stewart 1939). The Holotype, now deposited at LA,* was collected in "sunny crevices along stream, McKittrick Canyon" by Moore and Steyermark (No. 3563), August 22, 1931. Isotypes have been deposited at CAS, DS, GH, MICH, NY and PH (Irving 1980a).

Hedeoma apiculatum is a member of the **subgenus** Ciliatum, a group of morphologically **distinct**, narrowly restricted **endemics**. A8 a group, Ciliatum is thought to be an ancient line within <u>Hedeoma</u>. <u>Hedeoma apiculatum</u> is a polyploid species, its somatic or diploid **chromosome** number, **2n** = 144, is the second highest in the Lamiaceae (the mint family). It is most closely related to <u>Hedeoma todsenii</u>, an endangered endemic of the San **Andres** Mountains, New Mexico.

^{*}LA ** University of California at Los Angeles

CAS = California Academy of Sciences

DS = Stanford University

GH = Harvard University

MICH = University of Michigan

NY - New York Botanical Garden

PH = Academy of Natural Sciences of Philadelphia

Morphology

McKittrick pennyroyal is a long-lived perennial herb forming dense tufts from woody rootstocks. Leaves are opposite, thick, small, and lance-shaped, 0.1 to 0.2 in. (0.25 to 0.5 cm) wide, 0.3 to 0.6 in. (0.8 to 1.5 cm) long, margins without teeth, and tips pointed. Flowers are in clusters Of 1-3. The calyx is 0.5 in. (1.3 cm) long, tubular to funnel shaped; calyx teeth are lance-like in two sets. The corolla is of five united petals, two-lipped, 0.75 in. (1.9 cm) long, and pink colored. The fertile stamens are two; the fruit is of four nutlets, and sticky when wet.

McKittrick pennyroyal is distinguished from related species by its tufted habit; its thick, pointed, entire leaves; and its showy pink corolla. It differ8 from H. todsenii by the latter's smaller lavender Corolla, shorter calyx, apiculated leaves, and included anthers.

Distribution

McKittrick pennyroyal is known only from the semi-arid Guadalupe

Mountains of Culberson County, **Texas**, and Eddy County, New Mexico. Nine
major population8 are known in an area of approximately 12 mi² (40 km²).

Six of these are within Guadalupe Mountain8 National Park; one occurs just
outside the park's boundary in Lincoln National **Forest**; one occurs on
private land in Big Canyon, New Mexico; and one occurs in Big Canyon on
land adminieted by BLM. Table 1 lists specific localities. Figure 1
show8 the critical habitat which covers only three of the populations.

TABLE 1

PRECISE OCCURRENCES OF

HEDEOMA APICULATUM

Localities (Collections/Observations)

Current Status

- 1. Texas: Culberson Co., GMNP, Devils Den,
 1355-1800 m (1 collection & 3 observations
 by Mr. T.L. Burgess, 1974-76).
- Texas: Culberson Co., GMNP, South McKittrick Canyon including lower portions of "canyon to bowl," 1700-1800 m (ca. 15 collections & numerous observations).
- 3. Texas: Culberson Co., GMNP, above Turtle Rock on cliffs, 2160-2232 m (1 collection by T.L. **Burgess**, 1973, and several observations, 1976-79).
- 4. Texas: Culberson Co., GMNP, Pine Top (Hunter Peak) drainage, 2232-2592 m (2 collections, 1947-48; 3 observations, 1979; & detailed population count, 1982).
- 5. Texas: **Culberson** Co., GMNP, Bear Canyon, 2160 m (1 observation, 1979).
- 6. **Texas:** Culberson Co., GMNP, East Rim, approximately 2438 **m** (surveyed by Doug Buehler, July 1984).
- New Mexico: Eddy Co., Lincoln N.F., North McKittrick Canyon, 1798 m (1 collection by Dr. Northington, 1974).
- New Mexico: Eddy Co., Big Canyon (private land), 1567 m (1 collection, Dr. Dunford, 1976).
- 9. New Mexico: Eddy Co., Big Canyon (BLM administered land), 8.36 km (surveyed by Jesse Juen, BLM, August 1983).

Small, undisturbed population along a .72 km section of canyon. Included in critical habitat.

Largest and best known population (several hundred plants) spanning 1.6 km section of canyon along trail. Included in critical habitat.

Small population of SO-100 individuals on Turtle Rock and cliffs near McKittrick ridge trail. Included in critical habitat.

Population of over 100 individuals on summit.

Population consists of three plants on face of a boulder on Bear Canyon Trail.

Population of 150-200 plants, covering an area approximately 1.5 km long on the east rim.

Not seen by author, label data indicates scarce on alluvium above roadway.

Not seen by author, size unknown but believed to be less than 100.

Estimated that there were over 200 plants.

Total: These nine localities are scattered over approximately 40 km².

Total number of plants is estimated to be less than 1,500.

McKITTRICK PENNYROYAL

Culberson County, TEXAS

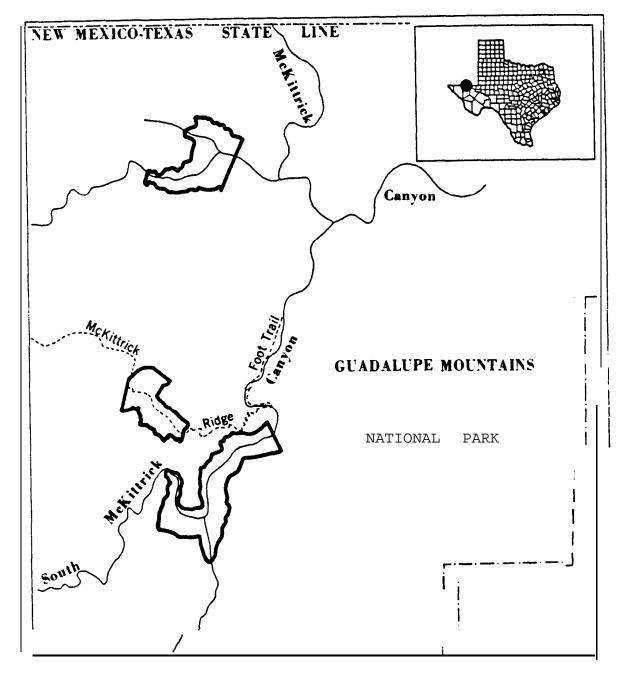


Figure 1. Critical habitat of McKittrick pennyroyal.

At the time McKittrick pennyroyal was listed in 1982, six population8 were known with four of them in the park. Critical habitat was declared for park areas that included the three largest and best known populations. Since the listing, two additional park population8 and one population on BLM land have been discovered. Tasks are presented in this plan to determine if additional critical habitat areas should be proposed.

The range of McKittrick pennyroyal lies within the Sacramento Mountains Section of the Basin and **Range** Province (Hunt 1967). Rainfall averages 21 in. (53.3 cm) per year, and the frost-free season averages 275 days. The plants occur from 5500 f t (1660 m) to 8400 f t (2550 m) in elevation.

Habitat

McKittrick pennyroyal is restricted to open limestone rock surfaces within the Madrean Evergreen Woodland Biotic Community (Brown and Lowe 1980).

Large boulder8 and limes tone ledges of protected canyon8 support the largest populations. The species is also found on steep limestone faces and ledges at higher elevations, 7085 to 7380 ft (2160 to 2250 m). While the rock surfaces that support colonies of McKittrick pennyroyal are usually exposed, they also provide a measure of protection from excessive desiccation.

Associated plant8 are Similarly restricted, and many are endemic to the area:

Aquilegia chaplinei

columbine

Pinaropappus parvus

no common name

Perityle quinqueflora rock daisy

Ghaetopappa hersheyi no common name

Nama xylopodum no common name

Selaginella pilifera resurrection plant

Petrophytum caespitosum rock-s pi raea

<u>Philadelphus hitchcockianus</u> **m** ck-orange

Population Biology

Hedeoma apiculatum is known from nine general localities scattered over approximately a 15.4 mt² (40 km²) area. In 1981, all planned future trail corridors in Guadalupe Mountains National Park were searched for additional populations, and none were found. The most recently discovered population was found on the east rim of the park by Doug Bueler (NPS) in July 1984. It is anticipated that additional localities may be found in some of the more inaccesssible regions of the Guadalupe Mountain Range. The number of individual plants per population ranges from three in the Bear Canyon drainage to several hundred at the largest concentration in South McKittrick Canyon. The density of plants is low, even at the South McKittrick Canyon local1 ty. Seldom are there more than two or three plants per 1076 ft² (100 m²). The total number of plants from all known localities is estimated to be less than 1,500.

Most plant growth for McKittrick pennyroyal **occurs** during the spring and summer--the period of highest rainfall in the Guadalupe region. With normal rainfall patterns, flowers will be produced in July, and

flowering will continue until fall. First-year plants typically produce very few flowers; older plants may produce as many as 100 flowers. The flowers will remain open for several days, but wither quickly after pollination. The nutlets require approximately 3 weeks to mature. In late summer and fall, young overwintering shoots emerge from the trailing woody roots tocks. The thick woody roots tocks, and field observations by the author between 1966 and 1979, indicate that McKittrick pennyroyal is a long-lived perennial.

McKittrick pennyroyal is primarily outbreeding, but is also capable of self-pollination. Seeds may be transported by water or wind. Within minutes after being moistened, the seed coat become mucilaginous and quickly adheres to a substrate. Calyces containing seeds may also abscise and serve as the dispersal vehicle.

A mature McKittrick pennyroyal plant averages 75 flowers per growing season with an average yield of one viable seed per flower. Seeds remain viable up to 5 years. They require no dormancy period or other special pretreatment8 for germination. Germination in the laboratory is approximately 50 percent.

Little is known of the population ecology of McKittrick pennyroyal.

Like many members of the genus, it is sensitive to competition. Colonies of the species are widely scattered on open rock surfaces and demonstrate little apparent interaction with other species. Seldom is McKittrick pennyroyal found on soil or on sites that are at advanced stages in primary succession. Yet in the greenhouse, McKittrick pennyroyal can be grown successfully in a variety of soil conditions. We can speculate

that streamways and high, exposed outcrop8 are favored habitat, since it is here that there are few competing species and succession is either interrupted by seasonal floods or precluded by the vertical aspect of the habitat. McKittrick pennyroyal may also assist in reducing competition by its production of monoterpenes, many of which have been demonstrated to have allelopathic effects (Irving 1980b).

There is no evidence of natural hybridization, and artificial hybridization has not been attempted. Its unusually high **polyploid** chromosome level $(2\underline{n} = 144)$ suggests that the likelihood of fertile F_1 hybrids resulting from interspecific **crosses** is low.

Land Ownership

Most of the known populations of McKittrick pennyroyal occur on public land administered by the National Park Service in Guadalupe Mountain8 National Park. One population occurs on private land, another on the southern edge of the Lincoln National Forest, and another on BLM administrated land.

Impacts and Threat8

Populations of McKittrick pennyroyal in Guadalupe Mountain8 National Park and adjacent Lincoln National Forest are relatively well protected from major modification or destruction of habitat. The administration of the national park recognizes the fragile nature of the park's plant and animal communities (National Park Service 1973) and has implemented

atives committee report recommended that there be close cooperation between the Forest Service and the National Park Service in preserving the environmental resources of North McKittrick Canyon and other canyon8 in Lincoln National Forest (National Park Service 1973). Yet, the population8 of McKittrick pennyroyal are potentially threatened. Existing trails permit access to most localities of the species; therefore, as trail use Increases there is the danger of destruction of local habitat. The plants are easily dislodged, and the cumulative impact of hikers leaving the trail and climbing over the ledges and boulder8 that support colonies of McKittrick pennyroyal could be devastating to the small and slowly reproducing populations. Additional ly, the showy and distinctive plants are highly visible from the trails and could be subject to increased collection.

New trail alignments are planned within the distribution of McKittrick pennyroyal. With some modification, these trail alignment8 should not threaten the known populations and could actually reduce visitor pressure in some areas. Guadalupe Mountain8 National Park is relatively new and, in all likelihood, will attract an increasing number of visitors.

During 1981 the park had approximately 36,411 back-country user days, compared to 26,300 in 1978 (National Park Service 1984). Trail counts of hikers into the South McKittrick biological area, a locality of McKittrick pennyroyal, were 323 in 1978 and more than 520 in 1979 (Phil Koepp, NPS, pers. comm. 1983). Future increases, as well as the construction of additional trails, shelters, or camping areas to accommodate them, could potent ially threaten the survival of pennyroyal populations.

The current status and potential threats to each of the known populations is reviewed below:

Hunter Peak Population: Once thought to contain only a small population,
Hunter Peak is now known to contain over 100 individual pennyroyal plants.

The plants grw abundantly on the ledges of the **peak's** approach slope,
and the largest population is found in the "high country".

The peak is of high interest to hikers in the Bowl, and the existing peak access trail from the Bowl Loop passes through the population.

Several plants are in the trail treadway. The trail is unimproved and hikers, especially on their return to the Bowl Loop, often leave the trail and scramble over the rocks and ledges that support the pennyroyal. The plants are easily dislodged by foot traffic so of f-trail use of the area poses the potential for population extirpation at Hunter Peak.

Park planning personnel have considered several alternatives to reduce the visitor impact at Hunter Peak. The currently recommended alternative is to improve the existing access trail and to construct an additional trail segment to create a Hunter Peak Loop. The improvements to the existing access trail would avoid as many of the individual pennyroyal plants as possible. The trail would be improved only to the extent that its route would be clearly defined. The new trail segment would be positioned downslope from the pennyroyal population. The Hunter Peak Loop would allow hikers of the Bowl Loop to visit the peak and return to the Bowl Loop ahead of where they departed for Hunter Peak. The new loop should minimize off-trail travel by hikers.

To further protect the Hunter Peak pennyroyal population and other fragile resources, all horse traffic has already been banned from the **peak** area.

McKittrick Canyon Population: The population in the South Fork of McKittrick
Canyon is the largest and best known of the penny-royal populations. It
serves as the basis for the common name. The plants are widely scattered
in crevices on rocks and large boulders of the canyon floor and on its
mesic walls. This population also extends into several small side canyons.
The canyon segment containing pennyroyals is 1.0 to 1.2 mi (1.6 to 2.0
km long), and estimates of plant density average 25 to 30 plants per
1640 ft (500 m) of canyon.

The portion of the South Fork of McKittrick Canyon containing the pennyroyal is identified as a sensitive biological area and contains a variety of unique biological resources. It has an undeveloped trail which is often no more than a series of cairns. In these areas a hiker must scramble over the boulders and ledges of the streamway. As a result, the plants are vulnerable to being dislodged and destroyed. Use of the South McKittrick biological area increased from 323 in 1978 to 520 in 1979, but decreased after 1980 with construction of the new Turtle Rock Trail. It has since been designated as a Research Natural Area and access is allowed only with a permit (Phil Koepp, NPS, pers. comm. 1984).

McKittrick Canyon Trail and Turtle Rock Population: The McKittrick Canyon Trail is the back-country hiking artery of Guadalupe Mountains National Park. As the trail begins to descend into McKittrick Canyon, there is a large and somewhat spectacular rock formation known as Turtle Rock. The trail skirts two sides of this formation at its base.

McKittrick pennyroyal is found on the sheer rock face along the McKittrick Canyon Trail just before the narrw ridge leading to Turtle Rock and on Turtle Rock itself. Many of the Turtle Rock plants grow on ledges along the trail; eight to ten occur in the actual treadway. The trail from Turtle Rock to the canyon floor has been reconstructed. Undoubtedly, some of the Turtle Rock population was lost by this work. The McKittrick Canyon Trail has been realigned and McKittrick pennyroyal was taken into consideration (Ralph Harris, NPS, pers. comm. 1983).

Devils Den Population: Devils Den **1s** a somewhat secluded canyon that dots not receive a large number of visitors. Presently, there art no trails planned for Devils Den. This area has also been designated as a Research Natural Area and access is by permit only (Phil Koepp, NPS, **pers.comm.** 1984). With no significant increase in visitors and with no trail or facilities construction in the canyon, the Devils Den population should remain stable.

<u>Bear Canyon Trail Population:</u> The Bear Canyon Trail population consists of three plants on the west face of a large boulder in the trail at an elevation of 7321 ft (2232 m). Its present status 18 unknown.

East Rim Population: This population occurs on an escarpment on the east side of the park. About 150 to 200 pennyroyals are found in an area that is approximately 0.9 ml (1.5 km) long. This area lies in the northern end of an area proposed for open camping. Although the pennyroyals are on a slope too steep for camping, they may still be threatened with trampling from campers climbing over the rocks.

Lincoln National Forest Population: The Lincoln National Forest population occurs in North McKittrick Canyon just beyond the boundary of Guadalupe Mountains National Park. The plants art scarce in rocky alluvium above the roadway. While there are currently no threats to this population, there is some consideration of exploratory mining for oil and gas. Conceivably, implementation of these plans could impact the population.

Big Canyon Population (private): The Big Canyon population is the only known population occurring on private lands. While its size is not known, it is believed the population has less than 100 individuals. Presumably the area is grazed and any significant increase in grazing could jeopardize the plants. Similarly, any road construction or major changes in land use could affect the population.

Big Canyon Population (BLM): This population was surveyed in August 1983. Over 160 plants were counted and the total population was estimated to be over 200. These plants were on a steep limestone bluff approximately 120 ft (37 m) high and extending for over 750 ft (229 m) at an elevation of 5080 ft (1548 m) to 5200 ft (1585 m) (Jutn 1983).

This population is threatened with the possibility of damage from seasonal runoff water. Two plants were located at the canyon bottom and several others were wi thin flood water levels (Juen 1983). Although the area is too steep for cattle, domestic sheep could ust the area. Exotic auodad sheep (Ammotragus lervia Pallas) have been sighted in Big Canyon. An increase in sheep could lead to greattr ust of the canyon resulting in increased erosion or actual consumption of the pennyroyal by sheep (Juen 1983). Mineral development is also a potential threat in this area (Juen 1983).

PART II

RE COVE RY

<u>Objective</u>

The main objectives of this recovery plan are to protect Hedtoma
apiculatum and its habitat from degradation due to human activities and to maintain, through management, healthy populations in their natural habitat at a level where the species can be delisted. The natural habitat is limited due to the specialized substrate requirements of the species.

Stabilization of the habitat and elimination of potential disturbances could lead to delisting of the species. With the limited amount of study on this species, the quantification of habitat and abundance necessary for delisting is not possible at this time. Further study of this species will provide data necessary to establish criteria for delisting.

The potential threats to the McKittrick pennyroyal include; (1) trail construction in Guadalupe Mountains National Park, (2) hiker foot traffic over its fragile rock habitat in Guadalupe Mountains National Park and in Lincoln National Forest, (3) potential trail and facilities development in response to growing visitor interest in the area, (4) potential mining or oil and gas activities in Lincoln National Forest and on BLM land, (5) increased grazing activities, and (6) possible damage from soil erosion and/or flooding of some areas.

Step-down Outline

- 1. Remove threats to Hedeoma apiculatum.
 - 11. Work with Federal agencies to ensure enforcement of existing regulations.
 - 12. Develop a management plan for populations in Guadalupe Mountains
 National Park.
 - 121. Increase park personnel awareness of McKittrick pennyroyal.
 - 122. Complete the Hunter Peak Loop hiking trail.
 - 123. Post signs stating the ecological sensitivity of the area and encouraging visitors to stay on trails.
 - 124. Evaluate all future trails or facilities development.
 - 125. Monitor McKittrick pennyroyal populations.
 - 1251. Develop permanent sample sites for major populations.
 - 1252. Monitor and record subsamples from the sample sites.
 - 126. Protect McKittrick pennyroyal from visitor impact.
 - 1261. Monitor the number of annual visitors to each population area.
 - 1262. Establish alternative action plans.
 - 127. Evaluate the value of **declaring** critical habitat for new park populations.
 - 13. Develop a management plan for the population in Lincoln National Forest.
 - 131. Increase Forest Service personnel awareness of McKittrick pennyroyal including location and fragility.

- 132. Post signs near the North McKittrick Canyon population.
- 133. Evaluate all future development or land use changes in the steep canyons south of Guadalupe Ridge.
- 134. Monitor the population as described in task 125.
- 135. Evaluate the value of declaring critical habitat for this population.
- 14. Seek cooperation of the private landowner to protect and maintain the Big Canyon population.
 - 141. Increase landwner awareness of McKittrick pennyroyal,
 including location and fragility.
 - 142. Monitor the population as described in task 125.
- 15. Develop a management plan for the population on BLM land in Big Canyon.
 - 151. Monitor the population as described in task 125.
 - 152. Post signs near the population.
 - 153. Evaluate all future development or land use changes.
 - 154. Monitor grazing.
 - 155. Evaluate the value of declaring critical habitat for this population.
- 2. Gather information for use in management of populations.
 - 21. Review population biology and ecology of the species.
 - 211. Determine the extent of reproduction by seed and overall reproductive success.
 - 212. Study the soil, climate, and microhabitat requirements.

- 22. Search for additional populations.
- 23. Develop techniques to artificially propagate (from seed or vegetatively) and transplant **H.** apiculatum.
- 24. Use information from population studies and from management to establish delisting criteria for the species.
- Develop public appreciation and support for the preservation of Hedeoma apiculatum.
 - 31. Increase public knwledgt of the Endangered Species Program and of McKittrick pennyroyal.
 - 32. Obtain support of local public interest groups.

Narrative

1. Remove threats to Hedeoma apiculatum.

Threats to this species can be **removed** by enforcement of **existing** regulations and by management of the species and its habitat.

Hedeoma apiculatum has a very limited distribution and needs strict enforcement of protective regulations. Ef **fect** ive **management** plans art also necessary to prevent future damage to individual plants and their habitat.

11. Work with Federal agencies to ensure enforcement of existing regulations.

These regulations provide for protection of endangered and threatened and/or vulnerable species and include the Endangered Species Act, as amended, the Federal Land Policy and Management Act, and National Park Service and Forest Service directives with respect to endangered species. Making this plant and its locality known to all field personnel of involved agencies would also facilitate Its protection.

12. <u>Develop a management plan for populations in Guadalupe Mountains</u> National Park.

Because the majority of **known** populations and the largest known populations occur in Guadalupe Mountains National Park, it is

imperative that a management plan be developed that includes the following:

121. Increase park personnel awareness of McKittrick pennyroyal. Park personnel should be trained to identify the species, advised of the location of all knwn park populations, and made knowledgeable of the plant's habitat requirements and fragility. Moreover, park personnel should ust such knowledge to periodically observe the condition of existing populations, to detect any adverse impacts to plants or populations and to discover additional populations. Such efforts are in addition to the formal monitoring program. Knowledge of the location of the North McKittrick Canyon population in Lincoln National Forest will enable park personnel to avoid sending backpackers into a pennyroyal area.

122. Complete the Hunter Peak Loop hiking trail.

The construction of the Hunter Peak Loop should channel visitor traf **fic** in such a way as to minimize the impact to the Hunter Peak peonyroyal population.

123. <u>Post signs stating the ecological sensitivity of the area</u> and encouraging visitors to stay on **trails.**

Signs should be posted at/in Hunter Peak, McKittrick Canyon Biological Area, Turtle Rock, the East Rim, and, probably, Devils Den advising visitors of the ecological sensitivity

of these areas and encouraging them to remain on trails.

To reduce the possibility of vandalism or collection, signs should not directly identify the plant or indicate exact localities for populations.

124. Evaluate all future trails or facilities development.

To avoid potential adverse impacts to McKittrick pennyroyal populations, all future trail or facilities developments should be evaluated. Such an evaluation should consider not only the direct or primary impact of construction, but also the indirect or secondary impact of increased area use.

125. Monitor McKittrick pennyroyal populations.

Monitoring will help determine the impact of park use on plants and can be used to evaluate the success of management decisions. Periodic moni toring should be conducted by resources management personnel at Turtle Rock, Hunter Peak, the McKittrick Canyon Biological Area, and Devils Den. The Turtle Rock and Hunter Peak populations should reflect the impact of large numbers of on-trail users, while the Biological Area would reflect light to moderate on and off-trail use. The Devils Den population would serve as a control with very light off-trail use.

- 1251. Develop permanent sample sites for major populations.

 Each population should be subsampled using permanent

 quadrat or photographic stations.
- These subsamples should be taken at the same time each year and should include areas of both high and moderate visitor use, as well as controls in areas that art not visited by hikers. In addition, each subsample should include the follwing: presence or absence of individual plant s, seedlings, and young plants; individual size of plants; presence of clumps or groups of plants; the number of flowers; evidence of injury (such as yellowing leaves, loss of branches); and other indicators of general conditions. Prepare a map or photographic record of the location of individual plants.

126. Protect McKittrick pennyroyal from visitor impact.

With increased park use, the possibility of damage to populations by park visitors will increase. Approgram should be established to monitor park visitation ntar pennyroyal populations and establish alternatives if adverse impacts from visitors art evident.

1261. Monitor the number of annual visitors to each population area.

If a population begins to show stress or damage, possible correlation with an increase in trail use will be missed in the absence of visitor data. Similarly, observed stress may be unrelated to use, and this too, would be overlooked in the absence of visitor data. Quantified visitor data can also aid development of realistic alternative management strategies. Rather than closing off an area when a plant population begins to be affected by visitor traffic, an area might remain open but at a reduced visitor level as determined from the user data base.

1262. Establish alternative action plans.

Early in the planning process the level of observed impact that will prompt alternative action should be set in consultation with FWS. Plans should consider visitor reduction, site closings, and restoration procedures and these plans should be implemented when adverse impacts become evident.

127. Evaluate the value of declaring critical habitat for new park populations.

At the time McKittrick pennyroyal was listed in 1982, six

population8 were knwn with four of then in the park.

Critical habitat was declared for park areas that included the three largest and beet known populations. Now that two additional park populations have been discovered and once all are better known, the value of declaring critical habitat for all park populations should be evaluated.

The FWS should propose critical habitat for theet areas if it is determined it will benefit the species.

13. <u>Develop a management plan for the population in Lincoln</u> National Forest.

A management plan should be developed for the population in Lincoln National Fortst that includes increasing **Forest** Service personnel awareness of McKittrick pennyroyal and informative signs should be posted.

131. Increase Forest Service personnel awareness of McKittrick pennyroyal including location and fragility.

All Forest Service personnel, especially field personnel, should be aware of McKittrick pennyroyal. They should be trained to identify the species and informed of the plant's habitat requirements and fragility. Moreover, Forest Service personnel should use such knowledge to periodically observe the condition of the existing populations, to detect any adverse impacts to plante or the population,

and to discover additional populations. Such ef forte are in addition to the formal monitoring program.

132. Post signs near the North McKittrick Canyon population. Signs should be posted which state the ecological sensitivity of the area and encourage individuals not to climb on side slopes of the canyon. Plants are easily dislodged and the impact of individuals climbing the canyon elopes that support McKittrick pennyroyal could be devastating to this population. To reduce the possibility of vandalism or collection, signs should not directly identify the plant or indicate exact localities for populations.

133. Evaluate all future development or land use change8 in the steep canyons south of Guadalupe Ridge.

An evaluation of future development of land use change8

south of Guadalupe Ridge should consider not only the

direct or primary impact of construction, but also the

indirect or secondary impact of increased area use. Any

leases or permits for oil and gas exploration or other

land use changes in North McKittrick Canyon should stipulate

protection of the pennyroyal as one requirement for least

or permit issuance. If any activities authorized, funded,

or carried out by the Forest Service will affect or may

affect the pennyroyal population, the Forest Service must

enter into consultation with the FWS under Section 7 of the ESA.

134. Monitor the population as described in task 125.

Fores t Service personnel should annually monitor the population, noting any adverse impact. If use of North

McKittrick Canyon increases or if oil and gas exploration occur, a more intense monitoring program should be devtloped.

135. Evaluate the value of declaring critical habitit for this population.

Once the status of this population **is** better known, the value of **declaring** critical habitat should be tvaluated. The FWS should propose critical habitat for this **ares** if it is determined it will benefit the species.

14. <u>Seek cooperation of the private landowner to protect and maintain</u> the Big Canyon population.

Although populations on **private** land lack the protection **against** collecting given to those on public land, it is important for the survival of the species that **attempts** be made to etcure those populations.

141. Increase landowner awareness of McKittrick pennyroyal, including location and fragility.

To avoid damaging plants, the landowner should be made aware of their location.

142. Monitor the population as described in task 125.

The U.S. Fish and Wildlife Service or another agency should **annually** monitor the population, noting any adverse effects.

15. Develop a management plan for the population on BLM land in Big Canyon.

One of the largest known populations of McKittrick pennyroyal occurs on BLM land in Big Canyon. A management plan should be developed for this population that includes the follwing:

151. Monitor the population as described in task 125.

Personnel from BLM should annually monitor the population. Any adverse impact from erosion caused by seasonal **runoff** water should be noted.

152. Post signs near the population.

Signs which advise of the ecological sensitivity of the area should be posted to minimize the impact to the plants and their habitat. To reduce the possibility of vandalism

or collection, signs should not directly identify tht plant or indicate exact localities for populations.

Such an evaluation should consider not only direct or primary impacts but also indirect impact8 of increased area use. If any activities authorized, funded, or carried out by BLM will affect or may affect this species, the BLM must enter into consultation with the FWS under Section 7 of the ESA.

154. Monitor grazing.

If overgrazing becomes evident, stocking rates should be lowered or livestock removed until range condition8 stabilize or improve. The impact to the habitat due to aoudad sheep should be monitored. If sheep cause habitat deterioration, a reduction program should be implemented.

155. Evaluate the value of declaring critical habitat for this population.

Since 1982 when McKittrick pennyroyal was listed and critical habitat declared, three additional populations have been discovered. The population on BLM administered land in Big Canyon is one of thost newly discovered and is now one of

the largest populations known. The value of declaring critical habitat for this population should be evaluated and FWS should propose critical habitat for this area if it is determined it will benefit the species.

2. Gather information for use in management of populations.

In order to manage the species effectively and deterndne criteria for **delisting**, it will be necessary to better understand the distribution, population biology, and ecology of the species.

21. Review population biology and ecology of the species.

In-depth knowledge of the population biology and ecology of McKittrick pennyroyal is needed to understand its population dynamic8 and habitat requirements. If appropriate data is not available from the li terature, appropriate studies should be conducted. When this information is known it may be used to help manage healthy, natural populations.

211. Determine the extent of reproduction by seed and overall reproductive success.

The annual seed yield of H. apiculatum is quite lw and no Seedling8 have been observed in the wild. Undoubtedly some seed reproduction occurs. A study of disperal mechanisms as well as germination and seedling requirements should yield valuable data on the requirements for population

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establishment and maintenance. Vegetative reproduction should also be examined.

212. Study the soil, climatic, and microhabitat requirements.

Additional knowledge of these factors should aid in managing current populations, locating new populations, and choosing sites for seeding and/or transplantation if condition8 indicate that the latter measure is necessary for specie8 survival. Integration of this information with task 211 could provide additional insight on the factor8 required for seed establishment and population growth.

Search for add bytonal populations

Based on information gathered in task 212, **determine** the **most** likely sites to search for additional population8 and investigate those areas for presence of the species.

23. Develop techniques to artificially propagate (from seed or vegetatively) and transplant **H.** apfculatum.

Information gathered under task 211 and 212 can be used to develop technique8 to artificially propagate and transplant **H**• apiculatum, if condition8 indicate that these measures will be necessary for species survival.

24. <u>Use information from population studies and from management to</u> establish delisting criteria **for** the species.

An evaluation of the success of management practice8 and information from population studies will make it possible to establish quantified delisting criteria for the species.

3. Develop public appreciation and support for the preservation of Hedeoma apiculatum.

Education of the public **is** a vital part of the recovery process. **The** cooperation of the public is essential for the ultimate success of the foregoing recovery measures.

31. <u>Increase public knowledge of the Endangered Species Program and of</u>

McKittrick pennyroyal.

Obtain the support of the National Park Service interpretative program and Forest Service public information personnel. Use displays, discussions, slide shows, and pamphlets to increase public knowledge of the endangered species program and of McKittrick pennyroyal.

32. Obtain support of local public interest groups.

Local public interest groups such as native plant **societies**, garden clubs, rotary, etc., need to be involved. Such o **rganiza- tions** will expose the general public to the statue of **H**• apiculatum and serve to focus on the problems associated with endangered and threatened plants of the area in general.

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Literature Cited

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PART III

IMPLEMENTATION S CHEDULE

The Implementation Schedule that follws is a summary of scheduled actions and costs for the McKittrick pennyroyal recovery program. It is a guide to meet the objective of the recovery plan for McKittrick pennyroyal, as elaborated in Part II, Narrative. This schedule indicates the general category for implementation (I * information gathering; M * management; A * acquisition; 0 * other), recovery plan tasks, corresponding action outline numbers, task priorities, duration of tasks ("ongoing" denotes a task that once begun should continue on an annual basis), which agencies are responsible to perform these tasks, and lastly, estimated costs for FWS tasks. Part III of this plan constitutes the actions, that When accomplished, should bring about the recovery of the threatened McKittrick pennyroyal and protect its habitat. It should be noted that monetary needs for agencies other than FWS are not identified and therefore Part III does not reflect the total financial requirements for the recovery of the species.

General Categories for Implementation Schedule

Information Gathering - I or R (research)

- 1. Population status
- 2. Habitat status
- 3. Habitat requirements
- 4. Management technique8
- 5. Taxonomic studies
- 6. Demographic studies
- 7. Propagation
- 8. Migration
- 9. Predation
- 10. Competition
- 11. Disease
- 12. Environmental contaminant
- 13. Reintroduction
- 14. Other information

Management - M

- 1. Propagation
- 2. Reintroduction
- 3. Habitat maintenance and manipulation
- 4. Predator and competitor control
- 5. Depredation control
- 6. Disease control
- 7. Other management

Acquisition -A

- 1. Lease
- 2. Easement
- 3. Management agreement
- 4. Exchange
- 5. Withdrawal
- 6. Fee title
- 7. Other

Other - 0

- 1. Information and education
- 2. Lav enforcement
- 3. Regulations
- 4. Administration

Recovery Action Priorities

- 1 = an action that must be taken to prevent extinctionor to prevent the species from declining irreversibly.
- 2 = an action that must be taken to prevent a significant decline in species
 population/habitat quality, or some other significant negative impact
 short of extinction.
- 3 3 all other action8 necessary to provide for full recovery of the species.

Abbreviation8 Used

FWS - USDI Fish and Wildlife Service

SE - Office of Endangered Species

LE - Law Enforcement

BLM - USDI Bureau of Land Management

NPS - USDI National Park Service

FS - USDA Forest Service

IMPLEMENTATION SCHEDULE

	1		!	Ţ		SIBLE AG			EAR costs		I COMMENTS
GENERAL		TASK #	PRIORITY #	TASK	FWS	Inno on the	OTHER			1	
CATEGORY1	(2)	 (3)	1 _I (4)	I duration [(5)		PROGRAM	 (7)	FY1 (8)	FY2	FY3	(9)
02	Enforce regulations.	11	2 	ongoing	 2 	LE SE	 BLM : FS NPS	\$ 2,000 !	 \$ 2,000 	 \$2,000 	
М7	Develop management	112,131 15	. 2 	1 year	2	i Se I	 NPS FS BLM	 3,000 	 	 	
М7	Increase park personnel awareness of McKittrick pennyroyal.	I I 121 I	2	ongoing	 	I I	 NPS 	 	! ! !		
М3	Complete Hunter	122	! ! 2 !	2 years			 NPS 			 	36
)1, 03	Post signs.	123 132 1 152	2	1 year		•	NPS FS BLM	 	 		
м3	/Evaluate all future development.	124 133 153	2	ongoing		İ	i nps fs blm				
м3		1 127 1 135 I 155	2	ongoing	2	İ	 NPS FS BLM	500	500	5001	
11	Monitor McKittrick pennyroyal Ipopulations.	125 134 142 1 151	2	ongoing	2	SE	 NPS FS BLM	8,000	5,000	5,000	

^{*}Costs refer to USFWS expenditures only.

IMPLEMENTATION SCHEDULE

armner Ir	T AN THE CIT]	A I DDT ODT OUT	l m a coz		SIBLE AGE			AR COST	.'S	I COMMENTS	
ATEGORY	PLAN TASK	TASK	# PRIORITY	TASK DURATION	FWS	DDOCDAM	OTHER	FY1	ST.)* FY2	FY3		
(1)	(2)	(3)	(4)	(5)	(6)	(6a)	1(7)	(8)		FIJ	(9)	
47	Protect McKittrick pennyroyal from visitorimpact.	1126	2	 ongoing 	 		 NPS 	 			 	
М7	Increase Fores t Service personnel awareness of McKittrick pennyroyal.	131	3	ongoing	2	SE I	FS					
м7	Increase land- lowner awareness of McKittrick pennyroyal.	141	3	ongoing	} 2 	SE I) 	
2, M3	 Monitor grazing.	154	2	ongoing	;]	 -	BLM	 		!	 	
	Review population biology and ecology.	21	2	5 years	2	SE		10,000	5,000	5,000		
	 Search for additional populations.	22	2	2 years	! ! 2	 SE 		5,000	5,000		 	
	I Develop techniques to artificially [propagate and transplant.	23	I 3	3 years	 2 	se I		 10,000 	 5,000 	5,000		

^{*}Costs refer to USFWS Expenditures only.

IMPLEMENTATION SCHEDULE

					RESPON	SIBLE AC	ENCY	FISCAL	YEAR COST	'S	COMMENTS
ENERAL	PLAN TASK	TASK #	PRIORITY	F TASK	FWS		OTHER		(EST.)*		
CATEGORY	7 		İ	DURATION		PROGRAM		FY1	FY2	FY3	
(1)	(2)	(3)	(4)	<u> (5) </u>	(6)	(6a)	' (7)	(8)	<u>'</u>	'	(9)
	1			_,	ļ	ī	'		•		
03	Establish delisting	24	! 3	º l ⊳ear	2	· SE	'		1	. 5∞	
	criteria.	Ţ	1	;		:		ŀ	;	ļ	
		!	!		!	! _					
01	Develop public	13	1 3	ongoing	! 2	SE		5,000	1,000	1,000	ļ
	appreciation		1	ļ	1	1			l	1	[
	and support.	j	1	i]	ı			Ī		1
	1	1	İ	1	1	1			1	1	

^{*}Costs refer to USFWS expenditures only.

APPENDIX

List of Reviewers

An agency draft of the McKittrick Pennyroyal Recovery Plan was sent to the following agencies for their review on September 21, 1984:

The Nature Conservancy, Albuquerque, New Mexico
Secretary, New Mexico Department of Natural Resources
Director, Texas Natural Heritage Program
Regional Forester, U.S. Forest Service, Region 3
Regional Director, National Park Service, Southwest Region
Director, Bureau of Land Management, New Mexico State Office
Ecological Services, Fort Worth Field Office, USFWS, Region 2
Ecological Services, Albuquerque Field Office, USFWS, Region 2
Division of Wildlife Research, USF'WS, Washington, D.C.
Director (AFA), USFWS, Washington, D. C.

Comments Received

Letters of comment on this plan have been reproduced in this section and are followed by the responses made to each comment.



United States Department of the Interior

FISH AND WILDLIFE SERVICE WASHINGTON, D.C. 20240

ADDRESS ONLY THE DIRECTOR. FISH AND WILDLIFESERVICE

End. Sp. R-2 JOHNSON LANGOV/SKI

Bowman Burton

Carley

Heilman Olvell

Halvorson

Stolferud

Botanist Hopp Padilla

SANCHEZ

A-3

In Reply Refer To:

FWS/OES

NOV 2 8 1984

Memorandum

To: Regional Director, Region 2 (ARD/AFF)

Acting Associate

From: Director

Subject: Comments on McKittrick Pennyroyal Recovery Plan - Agency

Draft

We have reviewed the subject plan and made comments in the margins of the attached plan. In addition, the following comments should be addressed:

- 2. Page 14 indicates that "seasonal runoff water" is a threat to the Big Canyon population, yet this is never addressed in the **Stepdown** Outline/Narrative.
 - 3. Tasks 132 and 152 call for the posting of signs to alert visitors of the ecological sensitivity of the area. Part I does not indicate that these particular areas are threatened by visitor use. Is the posting of signs justified?, #visitor usage of the area is not a threat, posting could draw unwanted attention to the area.
- 4. Subtasks 212, 22, 23, 'and 24 are the only places where transplanting/seeding are mentioned as possible future activities. The possibility of establishing new populations should be addressed in a separate task if we are seriously considering it.
- 5. Since the plan states that insufficient data exist to quantify criteria for delisting, an additional task needs to be added to the Stepdown/Narrative to determine the criteria which must be met to consider delisting.

We hope these comments will assist you in preparing the final plan for the Regional Director's approval. Upon such approval, please notify the Office of Endangered Species (OES). Also, provide OES with 30 copies of. the approved, printed plan when it is available.

> FWS REG 2 RECEIVED

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1 R. Fielding

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Attachment

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UNITED STATES GOVERNMENT

U.S. FISH & WILDLIFE SERVICE

Memorandum

DATE:

Acting Regional Director, FWS, AFF, Albuquerque, NM

January 2, 1985

DRD.

AHR____ LE -- --

End. Sp. R-

PAO EEO.

JOH

Bowman Burton

Carley

afferud

Botanist Норр Padilla

SANCHEZ

Halvorson Heiman Olwell

PROM

Field Supervisor, FWS, ES, Albuquerque, NM

B-1

B-2

SURJECT: Review of Agency Review Draft Recovery Plans for McKittrick pennyroyal and Todesen's pennyroyal (Mr. Fjetland's 9/21/84 memorandum)

> We have reviewed the subject draft plans and have made specific comments in pencil directly on the attached documents.

In general the plans appear well written. However, we suggest additional clarification is needed regarding Federal Agency compliance with Section regulations. Also, we question the validity of emphasizing the locality [file and rareness of these endangered plants. This can only increase human interest and result in collection or human use impacts.

The opportunity to comment is appreciated; if you have any questions please call Joel Medlin of my staff.

John C. Peterson

Attachment

cc: <w/d att)

Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico

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REC'D FWS-Region 2

JAN

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AFF

PORM PORM MAY 1992 EDITION SSA FPMR (41 CFR) 101-11.8 UNITED STATES GOVERNMENT

J.S.	FISH	&	WILDLIFE	SERVICE

Memorandum

: Regional Director, FWS, Albuquerque, NM (SE)

DATE: October 26, 1984 Halvorson Hoftman Olwell Spefferud Mex Норр Padilla

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: Field Supervisor, FWS, Ft. Worth, TX (ES)

IUBJECT: Agency Review Draft Recovery Plans for Hedeoma apiculatum and Callir

scabriuscula

We have reviewed the subject recovery plans per Mr. Fjetland's request in memorandums dated September 21, and October 5, 1984. Our comments are limited to two points that are applicable to any plans where the species in question are in our area of responsibility.

We believe positive actions to enhance the species should be spelled out in C-1a short, lucid, narrative and included at the beginning of the recovery This narrative should also be included in the "Red Book" when c-2 This would provide numerous agencies and organizations with information to include in their project plans. Additionally, improvements could be suggested by the ES biologist when preparing comments or during the pre-development consultation process on a particular project.

Secondly, we believe a mechanism is needed for recovery team and ES field c-3 station coordination during the recovery plan formulation process. coordination would oftentimes assist the ES field station during the pre-development consultation process with the action agency(s).

David a. Center

Forest

Service

OCT 2 5 1984

United States
Department of
Agriculture

End. Sp. R-2 JOHNSON Reply, To: 2670 LANCOWIKE Bate: Bowman Burton Carley Halvorson AWR Heilman AHR D Olwell LE Stefferud PAO. Botanist EEO. Hopp Padilla SANCHEZ

U.S. Fish and Wildlife Service P. 0. Box 1306
Albuquerque, NM 87 103

Regional Director

Dear Mr. Spear:

As requested in your September 21, 1984, letter, we have evaluated the agency review draft of the recovery plan for <u>Hedeoma apiculatum</u>. Our comments remain much as they were for the technical review draft.

D-1 Dr. Irving cites a collection of Hedeoma aoiculatum by Dr. Northington on the Lincoln National Forest above a roadway near 1758 meters elevation in North McKittrick Canyon. We still need the location of this population in order to monitor and safeguard it. There is no roadway near this elevation in North McKittrick Canyon.

We have encountered a few scattered <u>Hedeoma aoiculatum</u> plants in Big and Black Canyons. These plants are in remote and extremely inaccessible sites, both to recreationists and livestock. <u>Hedeoma aoiculatum</u> is considered in the evaluation of all Forest projects and the plant is being included in the Forest planning process. There is a high level of awareness toward <u>Hedeoma apiculatum</u> at both the District and Forest levels.

D-4 It is unclear in the plan at which **point** Hedeoma <u>apiculatum</u> can be delisted. If the goals set forth in the plan are reached, can the plant be delisted? A clear statement regarding the point of complete or adequate recovery is needed.

Since no critical habitat and few <u>Hedeoma aoiculatum</u> plants occur on the Lincoln National Forest, our role in recovering the species is minor; however, we fully support the recovery of the species and will continue in our attempts to locate new populations.

Sincerely,

Mailin O. Hugher JAMESC. OVERBAY

Deputy Regional Forester

cc:

Forest Supervisor, Lincoln National Forest

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United States Department of the Interior

BUREAU OF LAND MANAGEMENT NEW MEXICO STATE OFFICE P.O. BOX 1449

Santa Fe, New Mexico 87504-1449

NOV 9 1984

David a. Jone

LANGOWS Bowman EPLY REFER TO Burton 6840 (931) Chiley Halvorson RD-Figitman. DRD_ Olwell AA. Stifferud Hen A A MATE Hopo AHR Padilla 15. SANCHEZ PAO FILE

JOHNSON

Memorandum

To:

Regional Director, Region 2, FWS, Albuquerque, NM

From:

Deputy State Director, Lands and Renewable Resources, BLM

Santa Fe, NM

Subject:

McKittrick Pennyroyal Draft Recovery Plan

We have reviewed the subject recovery plan and have no comments.

We are aware that this plant occurs on public lands administered by our agency, E-l and we will continue to cooperate with the Fish and Wildlife Service in this effort

Thank you for the opportunity to review the subject plan.

FWS REG 2 RECEIVED

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REC' D FWS-Region 2

NOV 1 3 1984

Responses to Comments

- A-l Suggestion was incorporated.
- A-2 Suggestion was incorporated.
- A-3 Signs will not directly identify the plant or indicate exact localities for populations. Even though **visi** tor use in areas outside the park is not considered a threat, signs will still provide a helpful warning to agency or other personnel working near McKi t trick pennyroyal popula t ions.
- A-4 These sections have been revised. New populations will only be established if management indicates this measure is necessary for species survival.
- A-5 Suggestion was incorporated as aubtask 24 of the Step-down Outline.
- B-l Suggestion was incorporated
- B-2 Public support for protection and recovery of this species can only be achieved if the public is sufficiently aware of the plant's rarity. Due to the possibility of collecting or vandalism, specific locations are not given in this plan and any warning signs placed in the field will be posted in a manner that does not indicate the exact locality of any known populations.
- C-l A summary briefly outlining recovery goals, recovery criteria, and actions needed has been included at the beginning of the plan.
- C-2 Comment noted.
- C-3 Comment noted.

- D-1 Comment noted.
- D-2 Comment noted.
- D-3 Comment noted.
- D-4 An evaluation of the success of management practices and information from population biology and ecology studies are needed to establish quantified delisting criteria. Once this information is available, delisting criteria will be established. This has been included as a specific task in the plan.
- D-5 Comment noted.
- E-1 Comment noted.